

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

NATHAN ROBERTS and FREEDOM  
TRUCK DISPATCH LLC, on behalf of  
themselves and all others similarly situated,

*Plaintiffs,*

v.

PROGRESSIVE PREFERRED INSURANCE  
COMPANY; PROGRESSIVE CASUALTY  
INSURANCE COMPANY; CIRCULAR  
BOARD LLC,

*Defendants.*

Civil Action No. 1:23-cv-01597

JUDGE PATRICIA A. GAUGHAN  
Magistrate Judge James E. Grimes, Jr.

**DECLARATION OF LUCIA GOIN**

Pursuant to Local Rule 83.5(h), I, Lucia Goin, submit this declaration in support of my motion for leave to appear and practice in this case *pro hac vice* as counsel for *Amici Curiae* The Southern Poverty Law Center, the National Hispanic Bar Association, and Asian Americans Advancing Justice.

1. My full name is Lucia Goin.
2. My office is located at 1101 17th St NW, Suite 705, Washington DC 20036, and my office number is (504) 418-0697.
3. I certify that I am currently an active member in good standing of the bar of the District of Columbia (DC Bar No. 330418). I am admitted to practice before the U.S. District Court for the District of Columbia and the U.S. Court of Appeals for the D.C. Circuit.

4. I have never been disciplined by any bar, and there are no disciplinary proceedings pending against me as a member of the bar in any jurisdiction.
5. I have not been admitted to appear *pro hac vice* before this Court in the preceding two years.
6. I am not a member of the Ohio Bar and I do not have an application for membership pending.

I certify under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true.

Executed on December 21, 2023.

*s/ Lucia Goin*

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